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NEW YORK OFFICE 919 THIRD AVENUE NEW YORK, NY 10022

April 20, 2001

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APR 2 0 2001

Magalie Roman Salas, Secretary
Office of The Secretary
Federal Communications Commission
Portals II
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

VIA HAND DELIVERY

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re:

CC Docket No. 96-98/DA 01-911; Joint Petition of BelSouth, SBC and Verizon for Elimination of Mandatory Unbundling of High-Capacity Loops and Dedicated Transport

Dear Secretary Salas:

On behalf of Mpower Communications, Inc. ("Mpower"), enclosed please find an original and seven (7) copies of Mpower's Petition for Extension of Time in the above-referenced docket. Please date stamp and return the enclosed extra copy. Concurrently with this filing, Mpower is submitting one copy of its filing to Janice M. Myles, in the Common Carrier Bureau and sending a copy by courier to each person listed on the attached service list.

Should you have any questions with respect to this matter, please do not hesitate to call Ron Del Sesto at (202) 945-6923.

Respectfully submitted,

Mull W. Jel Lev J.

Ronald W. Del Sesto, Jr.

Counsel for Mpower Communications, Inc.

Enclosures

cc: Service List

RECEIVED

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

APR 2 0 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

in the Matter of:)	
)	
Implementation of the)	
Local Competition Provisions)	CC Docket No. 96-98
Of the Telecommunications Act of 1996)	
)	
Joint Petition of BellSouth, SBC, and Verizon)	
for Elimination of Mandatory Unbundling of)	DA 01-911
High-Capacity Loops and Dedicated Transport)	

MOTION FOR EXTENSION OF TIME

Mpower Communications, Corp. ("Mpower") requests that the Commission grant a 30 day extension of time for parties to file comments and reply comments in response to the above-referenced Joint Petition requesting that the Commission not require the unbundling of high-capacity loops and dedicated transport.

In order for interested parties to submit meaningful comments, they must analyze and consider the difficult and complex factual information issues raised in the Petition and in Attachment B to the Joint Petition titled "Competition for Special Access Service, High-Capacity Loops, and Interoffice Transport." The report purportedly demonstrates that the market for special access service is distinct from the market for local exchange services; that competition for special access is widespread and growing rapidly; and that the availability of competitive alternatives to high-capacity loops and interoffice transport that ILECs provide is widespread. Mpower and other interested parties will not be able to effectively evaluate and respond to the Joint Petition and its supporting information within the time periods currently established for comments and reply comments.

At the same time, the requested extension will permit the Commission to develop a more complete record on which to base a decision. In addition, no party will be prejudiced by granting additional time. Nor would an extension unduly delay the outcome of this proceeding.

Accordingly, the Commission should grant the requested changes extension of time for filing comments and reply comments in this proceeding.

Respectfully submitted,

Francis D. R. Coleman

Vice President, Regulatory Affairs

175 Sully's Trail - Suite 300

Pittsford, NY 14534

(716) 218-6568 (tel)

(716) 218-0165 (fax)

CERTIFICATE OF SERVICE

I, hereby certify that a copy of Mpower Communications, Inc.'s Petition for Extension of Time, was served by courier, on April 20, 2001, to the following individuals:

Magalie Roman Salas, Secretary Federal Communications Commission Portals II 445 12th Street, S.W., Room TW-B204 Washington, D.C. 20554

Dorothy Atwood Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Jonathan B. Banks Richard M. Sbaratta Bellsouth Corporation 1133 21st Street, N.W., Suite 900 Washington, D.C. 20036

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Michael E. Glover Edward Shakin Verizon Telephone Companies 1320 North Court House Road, 8th Floor Arlington, Virginia 22201 Janice M. Myles Common Carrier Bureau Federal Communications Commission 445 12th Street, S.W., Room 5-C327 Washington, D.C. 20554

Michele Carey Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Gary L. Phillips Roger K. Toppins Paul K. Mancini SBC Communications, Inc. 1401 Eye Street, N.W., Suite 1100 Washington, D.C. 20005

Daulphine Hunter